

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

**TORRENCE “LITTLE BOOSIE” HATCH;
LARRY ANDERSON; TYEON GIVENS; AND
NATHIA ENICE DANIELS AND
PEYTON NICOLE DANIELS, MINORS, BY AND
THROUGH THEIR PARENT AND NEXT
FRIEND, TYEON GIVENS**

PLAINTIFFS

VS.

CAUSE NO.: 1:17-CV-307-HSO-JCG

**DILLARD’S, INC.; JIM WILSON & ASSOCIATES, LLC;
WEISER SECURITY SERVICES, INC.;
CITY OF BILOXI, MISSISSIPPI; AND
JOHN DOES 1-10**

DEFENDANTS

**CITY OF BILOXI, MISSISSIPPI’S
RESPONSE TO PLAINTIFFS’ MOTION FOR PROTECTIVE ORDER**

COMES NOW the Defendant, the City of Biloxi, Mississippi (hereinafter referred to as “Biloxi”), by and through undersigned counsel, and files this its Response to the Motion for Protective Order filed on behalf of Torrence “Little Boosie” Hatch, Larry Anderson and Tyeon Givens, and in response thereto would state as follows:

I.

On January 17, 2019, the claims asserted by Plaintiffs as to Biloxi were resolved pursuant to settlement. During the course of those settlement negotiations, confidentiality was raised. Biloxi, as a public entity which would be contributing public funds, advised all parties of the potential limitations that existed regarding a confidentiality provision since a third party unconnected with the litigation could potentially seek disclosure of Biloxi’s settlement through a

Public Records Request given that there had been significant publicity regarding the case. Biloxi agreed that in the event a Public Records Request was received, it would advise all parties of the request thereby permitting any party to seek protection from disclosure through the appropriate Court.

II.

On April 19, 2019, Biloxi received a Public Records Request from the Sun Herald, a copy of which is attached as Exhibit “A” to Plaintiff’s Motion. Biloxi notified all parties of the request.

III.

Biloxi is prepared to comply with any Order issued by this Court.

Respectfully submitted, this the 3rd day of May, 2019.

CURRIE JOHNSON & MYERS, P.A.
Attorneys for the City of Biloxi, Mississippi

By: /s/ J. Henry Ros
J. Henry Ros, Esquire
Mississippi Bar Number 5668

J. HENRY “HANK” ROS, ESQUIRE
Mississippi Bar Number 5668
CURRIE JOHNSON & MYERS, P.A.
925 Tommy Munro Drive, Suite H
Biloxi, MS 39532
Telephone: (228) 385-1010
Facsimile: (228) 385-1011
hros@curriejohnson.com

CERTIFICATE OF SERVICE

I, J. Henry “Hank” Ros, do hereby certify that I have this day electronically filed with the Clerk of the Court using the ECF system who sent notification of such filing to:

Eduardo A. Flechas, Esquire
Flechas & Associates, P.A.
318 South Street
Jackson, MS 39201
Attorney for the Plaintiffs

Matthew M. Williams, Esquire
Galloway, Johnson, Thompkins, Burrs & Smith
2510 14th Street, Suite 910
Gulfport, MS 39501
Attorney for Defendant, Dillard’s, Inc.

William E. Whitfield, III, Esquire
Copeland, Cooke, Taylor & Bush, P.A.
2781 C.T. Switzer Sr. Drive, Suite 200
Biloxi, MS 39530
Attorney for Defendant, Jim Wilson & Associates, LLC

Johnny L. Nelms, Esquire
Copeland, Cooke, Taylor & Bush, P.A.
2781 C.T. Switzer Sr. Drive, Suite 200
Biloxi, MS 39530
Attorney for Defendant, Jim Wilson & Associates, LLC

This the 3rd day of May, 2019.

/s/ J. Henry Ros
J. Henry Ros, Esquire

J. HENRY “HANK” ROS, ESQUIRE
Mississippi Bar Number 5668
CURRIE JOHNSON & MYERS, P.A.
925 Tommy Munro Drive, Suite H
Biloxi, MS 39532
Telephone: (228) 385-1010
Facsimile: (228) 385-1011
hros@curriejohnson.com